

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., *et al.*, *

Plaintiffs, *

v. * No. 1:16-cv-03311-ELH

LAWRENCE HOGAN, *et al.* *

Defendants. *

* * * * *

DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME

Pursuant to Local Rule 105.9, defendants, through counsel and with the consent of the plaintiffs, move to extend the deadlines for defendants to file their combined response/reply to plaintiffs' cross-motion for summary judgment, defendants' response to plaintiffs' motion strike testimony of defendants' experts and plaintiffs' time to file their replies in further support of their cross-motion for summary judgment and motion to strike. In support of their motion, the defendants state:

1. On November 25, 2020, defendants filed their motion for summary judgment. (ECF 125.)
2. On January 28, 2021, plaintiffs filed their cross-motion for summary judgment. (ECF 135.)
3. Pursuant to the Court's Order dated November 5, 2020, defendants' combined response to plaintiffs' cross-motion for summary judgment and reply in further support of their own motion for summary judgment is due March 1, 2021. (ECF 123.)

4. In addition, on January 27, 2021, plaintiffs filed a motion to strike certain testimony of defendants' expert witnesses. (ECF 133.)

5. Pursuant to the Court's Order dated February 5, 2021, defendants' response to plaintiffs' motion to strike is due March 1, 2021. (ECF 137.)

6. Due to the demands of other work, defendants' counsel requires additional time to prepare defendants' responses to plaintiffs' pending motions.

7. Counsel for plaintiffs has consented to an extension of time to March 8, 2021 for defendants to file their combined summary judgment response/reply and their response to defendants' motion to strike.

8. In addition, defendants have agreed to extend plaintiffs' deadline to file their reply in further support of their cross-motion for summary judgment and their reply in further support of their motion to strike defendants' experts to April 14, 2021.

WHEREFORE, for the reasons stated herein, defendants respectfully request that the Court enter the attached proposed an order extending to March 8, 2021 defendants' time to file their combined response to plaintiffs' cross-motion for summary judgment (ECF 135) and reply in further support of defendants' motion for summary judgment (ECF 125), as well as defendants' opposition to plaintiffs' motion to strike (ECF 133), and extending to April 14, 2021 plaintiffs' time to file their reply in further support of their cross-motion for summary judgment and their reply in further support of their motion to strike defendants' experts.

Respectfully submitted,

BRIAN E. FROSH
Attorney General of Maryland

Date: February 24, 2021

____/s/ *Robert A. Scott*_____
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